

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

RICHARD GOULD,

Defendant

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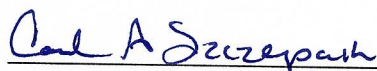
Case No. 1:21-cr-00159-JPC

Judge J. Philip Calabrese

DEFENDANT'S RESPONSE TO
PRESENTENCE INVESTIGATION REPORT

The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby responds to the Presentence Investigation Report prepared by Kristin Merrill in this case. The Defendant has no objection to the report. The Defendant does, however, respectfully request that this Honorable Court give due consideration to the factor of the Defendant's extensive medical issues in determining whether a sentence of imprisonment needs to be imposed in this case. In addition to the medical history available at the time the presentence investigation report was being completed the Defendant was recently advised that he needs additional spinal decompression surgery. That surgery has been scheduled for March 29, 2023. The probation officer has identified the Defendant's extensive medical issues as possible grounds for a variance from the applicable sentencing guideline provisions.

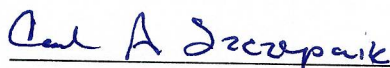
Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this response was sent on March 17, 2023, to Assistant United States Attorney Brian McDonough by e mail addressed to Brian.McDonough@usdoj.gov. and to Kristin Merrill by e mail addressed to Kristin_Merrill@ohnp.uscourts.gov



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Attorney for Defendant